

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RONNIE JONES, ET AL.,

Plaintiffs,

V.

CITY OF BOSTON, ET AL.,

Defendants.

CIVIL ACTION

NO. 05-11832-GAO

HEARING REQUESTED

**PLAINTIFFS' MOTION TO COMPEL
PSYCHEMEDICS CORPORATION TO PRODUCE ITS STANDARD OPERATING
PROCEDURES FOR TESTING HAIR SAMPLES FOR DRUGS OF ABUSE**

Plaintiffs Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, Rachelle Couch, Keri Hogan, and the Massachusetts Association of Minority Law Enforcement Officers, (together referred to herein as the “plaintiffs”) hereby move, pursuant to Rules 26, 37 and 45 of the Federal Rules of Civil Procedure, for an Order compelling Psychemedics Corporation (“Psychemedics”) to produce its Standard Operating Procedures (“SOP”) requested through document requests 5-10 of plaintiffs’ subpoena to Psychemedics. The grounds for this motion are set forth in the accompanying memorandum of law, and a proposed Order is attached hereto as Exhibit A.

Further, because Psychemedics has no good faith basis for continuing to withhold its requested SOP following extensive correspondence from plaintiffs' counsel and a meet-and-confer to discuss the basis of Psychemedics's blanket, conclusory objections, Psychemedics should be ordered to pay the plaintiffs' costs, including attorneys' fees, incurred in bringing this Motion, in an amount to be determined upon submission of an affidavit setting forth such costs.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(D), plaintiffs respectfully request a hearing on this motion.

CERTIFICATION PURSUANT TO RULE 7.1(A)(2)

I, Robert B. Baker, counsel for the plaintiffs, hereby certify pursuant to Local Rule 7.1(A)(2) that I conferred with J. Allen Holland, Jr., counsel for Psychomedics, including on April 11, 2007 and by letters dated February 28 and April 13, 2007, prior to filing this motion in an attempt to resolve the issues in dispute, and that we were unable fully and completely to resolve our disagreement.

Respectfully submitted,

Ronnie Jones, Richard Beckers, Walter Washington, William Earl Bridgeforth, Shawn N. Harris, Eugene Wade George C. Downing, Jr., Clararise Bristow, and the Massachusetts Association of Minority Law Enforcement Officers,

By their attorneys,

/s/ Robert B. Baker

Louis A. Rodriques, BBO # 424720

Rheba Rutkowski, BBO # 632799

Raquel J. Webster, BBO # 658796

Robert B. Baker, BBO # 654023

Eric A. Heining, BBO # 664900

BINGHAM McCUTCHEN LLP

150 Federal Street

Boston, MA 02110

(617) 951-8000

Nadine Cohen, BBO # 090040

Lawyers' Committee for Civil Rights

Under Law of the Boston Bar Association

294 Washington Street, Suite 443

Boston, Massachusetts 02108

(617) 482-1145

Maricia Woodham, BBO # 600886
SABEL & SABEL, P.C.
Hillwood Office Center
2800 Zelda Road; Ste. 100-5
Montgomery, AL 36106
(334) 271-2770

Dated May 15, 2007

CERTIFICATE OF SERVICE

I hereby certify that, on May 15, 2007, a true copy of the above document was served upon the attorney of record for each other party by first class mail and electronically via the ECF/CM. In addition, I hereby certify that, on May 15, 2007, a true copy of the above document was served upon counsel for Psychemedics, J. Allen Holland, Jr., by hand delivery.

/s/ Robert B. Baker

SO ORDERED.

The Honorable George A. O'Toole

United States District Judge

Dated: _____, 2007